

1 Steven F. Cherry (*pro hac vice*)
2 Adam M. Raviv (*pro hac vice*)
3 WILMER CUTLER PICKERING
4 HALE AND DORR LLP
5 1875 Pennsylvania Avenue, NW
Washington, DC 20006-3642
Telephone: (202) 663-6000
Facsimile: (202) 663-6363
Steven.Cherry@wilmerhale.com

6 Defense Co-Liaison Counsel and Attorneys for Chi Mei Corporation, Chimei Innolux Corporation
7 (f/k/a Chi Mei Optoelectronics Corporation), Chi Mei Optoelectronics USA, Inc., CMO Japan Co.,
Ltd., Nexgen Mediatech Inc., and Nexgen Mediatech USA, Inc.

8 [Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

3 | IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI
MDL No. 1827

This Document Relates to Individual
Case No. 3:10-cv-04945-SI

.6 TARGET CORP., *et al.*,

Plaintiffs.

STIPULATION AND [PROPOSED] ORDER REGARDING SERVICE AND SCHEDULING

-9 AU Optronics Corporation, et al.,

Defendants.

WHEREAS the undersigned counsel, on behalf of their respective clients, plaintiffs Target Corp., Sears, Roebuck and Co., Kmart Corp., Old Comp Inc., Good Guys, Inc., RadioShack Corp., and Newegg Inc. (collectively, “Plaintiffs”) filed a complaint in the above-captioned case against AU Optronics Corporation; AU Optronics Corporation America; Chi Mei Corporation; Chimei Innolux Corporation (*f/k/a* Chi Mei Optoelectronics Corporation); Chi Mei Optoelectronics USA, Inc.; CMO Japan Co., Ltd.; Nexgen Mediatech Inc.; Nexgen Mediatech USA, Inc.; Epson

1 Imaging Devices Corporation; Epson Electronics America, Inc.; LG Display Co., Ltd.; LG Display
2 America, Inc.; Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Electronics
3 America, Inc.; Sharp Corporation; Sharp Electronics Corporation; Toshiba Corporation; Toshiba
4 America Electronic Components, Inc.; Toshiba Mobile Display Co., Ltd.; and Toshiba America
5 Information Systems, Inc. (collectively, "Stipulating Defendants"), on November 1, 2010
6 ("Complaint");

7 WHEREAS Plaintiffs wish to avoid the burden and expense of serving process on the
8 Stipulating Defendants;

9 WHEREAS the Stipulating Defendants desire a reasonable amount of time to respond
10 to the Complaint;

11 WHEREAS Plaintiffs and the Stipulating Defendants believe that proceeding on a
12 unified response date will create efficiency for the Court and the parties by reducing duplicative
13 motion practice;

14 THEREFORE, Plaintiffs and the Stipulating Defendants hereby agree:

15 1. The Stipulating Defendants waive service of the Complaint under Federal Rule of
16 Civil Procedure 4(d). This stipulation does not constitute a waiver by the Stipulating Defendants of
17 any other substantive or procedural defense, including but not limited to the defense of lack of
18 personal or subject matter jurisdiction and improper venue.

19 2. The Stipulating Defendants' deadline to move to dismiss, answer, or otherwise
20 respond to the Complaint will be 90 days from the execution of this stipulation.

21 DATED: January 27, 2011

22 CROWELL & MORNING LLP

23 By: /s/ Jason C. Murray

24 Jason C. Murray

25 Jason C. Murray (CA SBN 169806)
26 515 South Flower Street, 40th Floor
27 Los Angeles, CA 90071
28 Tel: (213) 422-5582
Fax: (213) 622-2690
jmurray@crowell.com

Jeffrey H. Howard (*pro hac vice*)
Jerome A. Murphy (*pro hac vice*)
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: (202) 624-2500
Fax: (202) 628-5116
jhoward@crowell.com
jmurphy@crowell.com

Attorneys for Plaintiffs Target Corporation, Sears, Roebuck and Co., Kmart Corporation, Old Comp Inc., Good Guys, Inc., RadioShack Corporation, and Newegg Inc.

WILMER CUTLER PICKERING HALE AND DORR LLP

By: /s/ Steven F. Cherry

Steven F. Cherry

Steven F. Cherry (*pro hac vice*)
Adam M. Raviv (*pro hac vice*)
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Tel: (202) 663-6000
Fax: (202) 663-6363
steven.cherry@wilmerhale.com
adam.raviv@wilmerhale.com

Defense Co-Liaison Counsel and Attorneys for Chi Mei Corporation, Chimei Innolux Corporation (f/k/a Chi Mei Optoelectronics Corporation), Chi Mei Optoelectronics USA, Inc., CMO Japan Co., Ltd., Nexgen Mediatech Inc., and Nexgen Mediatech USA, Inc.

NOSSAMAN LLP

By: /s/ Christopher A. Nedeau

Christopher A. Nedeau

Christopher A. Nedeau (CA SBN 81297)
Carl L. Blumenstein (CA SBN 124158)
Allison M. Dibley (CA SBN 213104)
50 California Street, 34th Floor
San Francisco, CA 94111
Tel: (415) 398-3600
Fax: (415) 398-2438
cnedeauf@nossaman.com
cblumenstein@nossaman.com

1 adibley@nossaman.com
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Defense Co-Liaison Counsel and Attorneys for Defendants
AU Optronics Corporation and AU Optronics Corporation
America

CLEARY GOTTLIEB STEEN & HAMILTON LLP

By: /s/ Jeremy J. Calsyn

Jeremy J. Calsyn

Michael R. Lazerwitz (*pro hac vice*)
Jeremy J. Calsyn (CA SBN 205062)
Lee F. Berger (CA SBN 222756)
2000 Pennsylvania Avenue NW
Washington, DC 20006
Tel.: (202) 974-1500
Fax: (202) 974-1999
mlazerwitz@cgsh.com
jcalsyn@cgsh.com
lberger@cgsh.com

Attorneys for Defendants LG Display Co., Ltd. and LG
Display America, Inc.

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ John M. Grenfell

John M. Grenfell

John M. Grenfell (CA SBN 88500)
Jacob R. Sorensen (CA SBN 209134)
Fusae Nara (*pro hac vice*)
Andrew D. Lanphere (CA SBN 191479)
50 Fremont Street
San Francisco, CA 94105
Tel.: (415) 983-1000
Fax: (415) 983-1200
john.grenfell@pillsburylaw.com
jake.sorensen@pillsburylaw.com
fusae.nara@pillsburylaw.com
andrew.lanphere@pillsburylaw.com

Attorneys for Defendants Sharp Corporation and Sharp
Electronics Corporation

1 MORRISON & FOERSTER LLP
2

3 By: /s/ Stephen P. Freccero
4

5 Stephen P. Freccero
6

7 Melvin R. Goldman (CA SBN 34097)
8 Stephen P. Freccero (CA SBN 131093)
9 Derek F. Foran (CA SBN 224569)
10 425 Market Street
11 San Francisco, CA 94105
12 Tel.: (415) 268-7000
13 Fax: (415) 268-7522
14 mgoldman@mofo.com
15 sfreccero@mofo.com
16 dforan@mofo.com
17

18 *Attorneys for Defendants Epson Imaging Devices
19 Corporation and Epson Electronics America, Inc.*

20 COVINGTON & BURLING LLP
21

22 By: /s/ Simon J. Frankel
23

24 Simon J. Frankel
25

26 Simon J. Frankel (CA SBN 171552)
27 Jeffrey M. Davidson (CA SBN 248620)
28 One Front Street, 35th Floor
San Francisco, CA 94111
Tel.: (415) 591-6000
Fax: (415) 591-6091
sfrankel@cov.com
jdavidson@cov.com
19

20 *Attorneys for Defendants Samsung Electronics Co., Ltd.,
21 Samsung Semiconductor, Inc., and Samsung Electronics
22 America, Inc.*

23 WHITE & CASE LLP
24

25 By: /s/ John H. Chung
26

27 John H. Chung
28

29 John H. Chung (*pro hac vice*)
30 1155 Avenue of the Americas
31 New York, NY 10036
32 Tel: (212) 819-8200
33 Fax: (212) 354-8113
34

1 jchung@whitecase.com
2

3 Christopher M. Curran (*pro hac vice*)
4 Kristen J. McAhren (*pro hac vice*)
5 701 Thirteenth Street, NW
6 Washington, DC 20005
7 Tel: (202) 626-3600
8 Fax: (202) 639-9355
9 ccurran@whitecase.com
10 kmcahren@whitecase.com

11 *Attorneys for Defendants Toshiba Corporation, Toshiba*
12 *America Electronic Components, Inc., Toshiba Mobile*
13 *Display Co., Ltd., and Toshiba America Information*
14 *Systems, Inc.*

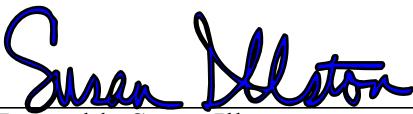
15 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of
16 this document has been obtained from Jason C. Murray, Christopher A. Nedeau, Jeremy J. Calsyn,
17 John M. Grenfell, Stephen P. Freccero, Simon J. Frankel, and John H. Chung.
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1 [PROPOSED] ORDER

2 Pursuant to the stipulation of the parties, IT IS SO ORDERED.

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5 Dated: _____


The Honorable Susan Illston
United States District Judge

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